## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

DONALD J. TRUMP FOR PRESIDENT, INC.,

Plaintiff,

VS.

Civil No.: 3:20-cv-00385-wmc

NORTHLAND TELEVISION, LLC d/b/a WJFW-NBC,

Defendant.

## DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT WITH PREJUDICE

Defendant Northland Television, LLC d/b/a WJFW-NBC, by its counsel, hereby moves this Court, under Federal Rule of Civil Procedure 12(b)(6), for an order dismissing Plaintiff's Complaint with prejudice and granting such other relief as appropriate under the circumstances. The grounds for this motion are set forth in the accompanying brief and all other papers and records on file in this action.

Dated: May 6, 2020

## BALLARD SPAHR LLP

Charles D. Tobin (admitted *pro hac vice*) Al-Amyn Sumar (admitted *pro hac vice*) 1909 K Street, NW, 12th Floor Washington, DC 20006-1157

Phone: (202) 661-2218 Fax: (202) 661-2299 tobinc@ballardspahr.com sumara@ballardspahr.com

Ashley I. Kissinger (admitted *pro hac vice*) 1225 17th Street, Suite 2300 Denver, CO 80202

Phone: (303) 376-2407 Fax: (303) 296-3956

kissingera@ballardspahr.com

Respectfully submitted,

## GODFREY & KAHN S.C.

s/ Brady Williamson

Brady C. Williamson Mike B. Wittenwyler bwilliam@gklaw.com mwittenwyler@gklaw.com One East Main Street, Suite 500 Madison, WI 53703-3300

Phone: (608) 257-3911 Fax: (608) 257-0609

Counsel for Defendant Northland Television, LLC d/b/a WJFW-NBC

**CERTIFICATE OF SERVICE** 

I hereby certify that, on this date, I caused the foregoing Motion to Dismiss Plaintiff's

Complaint with Prejudice, the accompanying Memorandum in Support, the Declaration of Jill

Bradshaw and the exhibits thereto to be filed and served electronically via the Court's ECF

System upon counsel of record. A DVD containing Exhibit G will be served upon the Clerk of

the Court and counsel of record via Federal Express.

Dated: May 6, 2020

s/ Brady Williamson

Brady Williamson